# SANDLER, REIFF, YOUNG & LAMB, P.C.

October 9, 2013

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Jeffrey S. Jordan
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: MUR 6749

The undersigned represents Trust Women PAC, and Amber Lockner, in her official capacity as Treasurer. I write to respond to the complaint submitted by Operation Rescue, on July 29, 2013. I request that the FEC close the file on this complaint, and take no further enforcement action against Trust Women PAC.

# Introduction

Operation Rescue sets out five core complaints: (1) that Trust Women PAC failed to report contributions to federal candidates and committees in the proper manner, and failed to submit proper reports; (2) that Trust Women PAC has engaged in political advocacy in Kansas without registering under the Kansas statute; (3) that Trust Women PAC submitted reports through an unauthorized treasurer; (4) that Trust Women PAC used PAC funds to operate a forprofit business; and (5) that Trust Women PAC made disbursement of funds to "non-existent entities sharing the Trust Women PAC address."

All five of these complaints are without merit: (1) Trust Women PAC has reported contributions to federal candidates and committees in a proper manner, and has adequately complied with federal campaign finance law; (2) the FEC has no jurisdiction over Kansas state law; (3) Trust Women PAC has not submitted reports through an unauthorized treasurer; (4) Trust Women PAC has not used PAC funds and resources to operate a for-profit business, and would not be barred from doing so under FEC regulations; and (5) Trust Women PAC has not violated federal campaign finance law by making disbursements to committees with the same address.

Operation Rescue's complaint contains multiple frivolous, irrelevant claims that do not arise from the enforcement of federal campaign finance law. Operation Rescue's complaint is

<sup>1</sup> See Operation Rescue FEC Complaint.

ultimately driven by political motivations, and not by a desire to ensure compliance with federal regulations.

Additionally, Trust Women PAC has retained the services of an auditor to rectify any issues with their FEC reports.

For the reasons stated below, the Federal Election Commission ("FEC") should close the file on this complaint, and take no further enforcement action against Trust Women PAC.

# Operation Rescue's Complaints

1. Trust Women PAC has not failed to report contributions to federal candidates and committees in a proper manner, and has adequately complied with federal campaign finance law.

Operation Rescue's complaints 1-4 will be addressed in this section.

Operation Rescue points to four different issues that are ultimately linked: (A) that Trust Women PAC failed "to report contributions to Federal Candidates/Committees and Other Political Committees in a proper manner."; (B) that Trust Women PAC failed to "classify disbursements in a proper manner", (C) failed to "file a single acceptable report since July 2011" and (D) committed "Consistent error[s] in calculation and reporting of cash at hand and disbursements."

However, all of these claims are untrue. Trust Women PAC has not failed to report contributions to federal candidates and committees in a proper manner, and has adequately complied with federal campaign finance law.

Any issues regarding Trust Women PAC's filings will be rectified by amendment.

Reports are compliant when "...the treasurer of a political committee shows that best efforts have been used to obtain, maintain and submit the information required by the Act for the political committee..." None of Operation Rescue's claims regard Trust Women PAC's compliance with federal campaign finance law.

Rather, these complaints attempt to turn very slight reporting issues into larger issues. Issues with Trust Women PAC's reports are attributable to human errors in its vendor software, and are not indicative of any wrongdoing.

<sup>&</sup>lt;sup>2</sup> Operation Rescue FEC Complaint at 2-4.

<sup>&</sup>lt;sup>3</sup> 11 C.F.R. § 104.7(a); 11 C.F.R. § 102.9(d).

# A. Failure to report contributions.

Operation Rescue claims that Trust Women PAC failed to report contributions to federal candidates and committees.<sup>4</sup> Operation Rescue claims that contributions were inadequately reported in the 2012 Year-End report, the 30-Day Post General report, and in the October 2012 report.<sup>5</sup> These errors were brought to the attention of Amber Lockner, Trust Women PAC's treasurer. In all cases, these disbursements have been properly reported, but were not properly classified.

The 2012 Year-End report issues were brought to Trust Women PAC's attention on July 31, 2013. Contributions were made to "Rosa Meza Harrison for Congress", and to "Snow for Senate", but were not shown on summary line 23 of the PAC's report.

Trust Women PAC will amend their 2012 Year-End report to address this slight issue.

The 30-Day Post-General report issues were bought to Trust Women PAC's attention on December 14, 2012. The PAC filed their Post-General report on July 15, 2013, addressing the issues cited.

The October 2012 report issues were brought to Trust Women PAC's attention on February 6, 2013. Contributions were made to "Kelda for Congress", and to "Friends of Laura Ruderman", but were not shown on summary line 23 of the PAC's report.

Trust Women PAC will amend their October 2012 report to address this slight issue.

Trust Women PAC has made its best efforts to comply with the FEC's notices and reporting requirements, and will rectify any further issues with their filings by amendment.

## B. Failure to classify disbursements.

Operation Rescue claims that Trust Women PAC has failed to classify disbursements in a proper manner in the 2012 Year-End report, the 2012 Post-General report, and the July and April 2013 reports.<sup>10</sup> However, this claim is without merit.

Operation Rescue insinuates that, simply because the 2012 Primary Election was selected as the purpose of the disbursement, there must be wrongdoing. This is not the case. These errors are a minor human error in reporting, and were not done with any ill will or neglect. The "Primary" disbursement box was simply checked instead of the "General" disbursement box.

<sup>&</sup>lt;sup>4</sup> Operation Rescue FEC Complaint at 2.

S Id.

<sup>&</sup>lt;sup>6</sup> See Trust Women PAC Exhibit A, "RFAI for Year-End 2012 Report."

<sup>&#</sup>x27; <u>[d.</u>

See Trust Women PAC Exhibit A, "Post General Report Notice."

<sup>9</sup> See Trust Women PAC Exhibit A, "RFAI for October 2012 Report."

<sup>10</sup> Operation Rescue FEC Complaint at 2.

<sup>11</sup> Operation Rescue FEC Complaint at 2; 9.

The FEC has not submitted an RFAI to Trust Women PAC regarding this issue. Trust Women PAC will amend their reports to address this slight issue.

# C. Failure to file "a single acceptable report."

Operation Rescue claims that Trust Women PAC has failed to file a single acceptable report since July 2011. This claim is untrue. Instead of making a particular complaint about a report, Operation Rescue lists every report that has received an RFAI from the FEC, or any report that has been amended. <sup>13</sup>

Operation Rescue makes no claim in this section that the FEC could respond to, or that the FEC could use for enforcement purposes. These reports are not "unacceptable" simply because they contained issues for amendment. Amber Lockner has properly served as the committee's treasurer, and has properly submitted reports.<sup>14</sup>

Trust Women PAC made its best efforts to comply with the FEC's notices and reporting requirements, and will rectify any further issues with their filings by amendment.

## D. "Consistent error in calculation and reporting,"

Operation Rescue claims that Trust Women PAC has made consistent errors in calculation and reporting. <sup>15</sup> However, these claims are untrue. These errors were brought to the attention of Amber Lockner, and have been and will continue to be rectified by amendment. Trust Women PAC has complied with all federal campaign finance regulations regarding disbursements and contributions.

Operation Rescue cites multiple examples to support its claim, involving cash on hand numbers, disbursements, and unitemized contributions.

As to Trust Women PAC's cash on hand, all of the examples cited by Operation Rescue have been brought to the PAC's attention by the FEC, and will be rectified in subsequent amendments.

All of the cash on hand numbers cited by Operation Rescue for July 2013, Year End 2012, October 2012, and July 2012 reflect previous versions that have since been amended. This is particularly troubling, as Operation Rescue cites Trust Women PAC's amended reports in other sections, but chooses to ignore them in this section.

Operation Rescue also cites previous versions of April 2013, July 2013, and April 2012 reports, regarding disbursements. Trust Women PAC is only required to itemize disbursements of above \$200. 16 Trust Women PAC has complied with this requirement in all cases cited by

14 See Section 3.

16 See 11 C.F.R. § 104.3.

<sup>&</sup>lt;sup>12</sup> Operation Rescue FEC Complaint at 2-3.

<sup>&#</sup>x27;3 ld.

<sup>15</sup> Operation Rescue FEC Complaint at 3.

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Operation Rescue, and made its best efforts to comply with the FEC's notices regarding these calculations.

Trust Women PAC has also complied with all FEC regulations regarding unitemized contributions. The PAC is completely within its rights to not itemize contributions below \$200.<sup>17</sup>

It is important to note that Operation Rescue makes multiple spurious claims in this section, asking: "Where has all the money gone? Where did all the non-itemized receipts come from? Why are there thousands of dollars in disbursements that no one can track? Why do amended reports reflect such great discrepancies in cash on hand? Is this a matter of incompetent accounting or unlawful activity?" <sup>18</sup>

These accusations are made without further substantiation or further comment, and fail to meet the sufficiency standards for FEC complaints.<sup>19</sup> These accusations do not reflect the level of professionalism that is expected in these matters.

Operation Rescue's complaints 1-4 are without merit. Trust Women PAC has not failed to report contributions to federal candidates and committees in a proper manner, and has adequately complied with federal campaign finance law.

Although Trust Women PAC has had issues in using its vendor software, these issues would be better handled by the Reports Analysis Division.<sup>20</sup> A complaint should not be used to circumvent this process.

# 2. The FEC should not interpret or enforce Kansas campaign finance law.

Operation Rescue claims that Trust Women PAC engaged "in political advocacy within the state of Kansas without registering with the state in accordance with KS Statute."<sup>21</sup>

The FEC is not bound by and should not be forced to enforce Kansas state law. The FEC should not take further action on the complaints in this section.

<sup>17 &</sup>lt;u>ld.</u>

<sup>18</sup> Operation Rescue FEC Complaint at 4-5.

<sup>19</sup> See 11 C.F.R. § 111.4(c); 11 C.F.R. § 111.4(d)(2) ("The complaint should differentiate between statements based upon personal knowledge and statements based upon information and belief. ... [s]tatements which are not based upon personal knowledge should be accompanied by an identification of the source of information which gives rise to the complainants belief in the truth of such statements. .."); see also Federal Election Commission MUR 5878, Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioners Caroline C. Hunter and Matthew S. Peterson (analyzing the heightened sufficiency standard for FEC complaints).

<sup>&</sup>lt;sup>20</sup> Obviously, if the Reports Analysis Division seeks to audit the Trust Women PAC in the ordinary course of its business, the PAC will fully cooperate with the division.

<sup>&</sup>lt;sup>21</sup> Operation Rescue FEC Complaint at 5.

If Operation Rescue were truly serious about this potential violation, their complaint would be better suited to the Kansas Ethics Commission, where Trust Women PAC has been fully compliant with Kansas law.

# 3. Trust Women PAC has not submitted reports through an unauthorized treasurer.

Operation Rescue claims that Trust Women PAC submitted reports "through a nonauthorized treasurer."22 However, this claim is untrue. Amber Lockner has properly served as the committee's treasurer since October 2012, and has properly submitted reports.

Trust Women PAC wished to change their PAC treasurer in October 2012. The PAC filed an amended FEC Form 1 listing Amber Lockner as the new treasurer on October 30, 2012, which was received by the FEC on November 5.23 This filing was rejected by the FEC on November 13, 2012, for failure to file electronically.<sup>24</sup>

Trust Women PAC then filed another amended Form 1 listing Amber Lockner as the treasurer on November 27, 2012, emailing the form to pubrec@fec.gov. 25. This filing was rejected by the FEC on February 6, 2012, for failure to properly file electronically.<sup>26</sup> A statement of organization was accepted by the FEC on August 2, 2013, listing Amber Lockner as the treasurer.27

In the meantime, Trust Women PAC continued to file required reports. Former treasurer Tiffany Reynolds-Richardson submitted reports prior to November 2012.

For 2012 reports, Amber Lockner submitted: (1) an amendment to the April 2012 report on January 21, 2013; (2) an amendment to the July 2012 report on March 12 and August 5, 2013; (3) an amendment to the October 2012 report on March 12 and August 5, 2013; (4) and a Year-End report for 2012 and amendments on January 16, April 15, and August 5, 2013.

2013 reports were submitted under Amber Lockner's name for April 2013 on April 15, 2013, with an amendment on August 5, 2013, and for July 2013 on July 15, 2013. Amber Lockner did not submit any reports before the first amended Form 1 was submitted on October 30, 2012.

Treasurers serve "...on behalf of the committee, designating the treasurer as the representative of the committee for purposes of compliance." Treasurers have the "...primary and personal duty to perform" their duties to the committee. 29 Amber Lockner, despite not being explicitly approved as Trust Women PAC's treasurer until August 2, 2013, properly acted as the treasurer and representative for the organization from November 2012 onwards.

<sup>23</sup> See Trust Women PAC Exhibit B, "October Letter to Change Treasurer."

24 See Trust Women PAC Exhibit B, "November FEC Rejection Letter."

25 See Trust Women PAC Exhibit B, "November Email to Change Treasurer."

26 See Trust Women PAC Exhibit B, "February FEC Rejection Letter."

27 See Trust Women PAC Exhibit B, "August 2013 Amended Form 1."

<sup>&</sup>lt;sup>28</sup> 70 Fed. Reg. 3 (January 3, 2005); Federal Election Commission Notice 2004-20.

<sup>&</sup>lt;sup>29</sup> Federal Election Commission AO 1995-10 at 4 (Helms).

The FEC was even on notice that the PAC had changed treasurers. The November 13 letter from the FEC lists "Amber Lockner" as the treasurer of Trust Women PAC, showing that the FEC was aware that Trust Women PAC was attempting to change their treasurer. Amber Lockner did not submit any reports before this date, and continually attempted to amend the PAC's Form 1 to show her new position as PAC treasurer.

Amber Lockner has properly served as the committee's treasurer, and has properly submitted reports. Trust Women PAC has responded to all FEC matters in a prompt and forthright manner.

4. Trust Women PAC has not used PAC funds and resources to operate a for-profit business, and would not be barred from doing so by FEC regulations.

Operation Rescue claims that Trust Women PAC used PAC funds and resources to "operate a for-profit business." However, this claim is untrue, and is ultimately irrelevant. The FEC gives wide discretion on how PACs spend their funds, and does not set outer limits on PAC spending. The for-profit business in question has also reimbursed Trust Women PAC for all expenses cited by Operation Rescue. These reimbursements will appear on Trust Women PAC's October FEC report.

Unlike FEC restrictions on the use of candidate funds, the FEC does not regulate how a PAC spends its funds.<sup>31</sup> Assuming *arguendo* that Trust Women PAC was barred from operating a for-profit business, Operation Rescue's claims would still be without merit.

Operation Rescue cites three separate examples of how Trust Women PAC used PAC funds to operate a for-profit business, specifically the South Wind Women's Center ("SWWC"): (1) that Trust Women PAC's President Julie Burkhart incorporated the SWWC and appears in a photograph at the SWWC; (2) that Trust Women PAC purchased items for the SWWC; (3) that an employee sent an email related to the SWWC from a Trust Women PAC email address.

These three examples, along with the other unsubstantiated accusations made in this section, are based on pure speculation, and are irrelevant.<sup>32</sup> Operation Rescue's argument in this section has also failed to meet the criteria for a proper complaint under FEC rules.<sup>33</sup>

<sup>30</sup> See Trust Women PAC Exhibit B, "November FEC Rejection Letter."

Sce. e.g. Federal Election Commission MUR 5878, Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioners Caroline C. Hunter and Matthew S. Peterson at 10 ("... This practice of transferring non-federal and federal funds among party committees is entirely lawful..."); see also Emily's List v. Federal Election Com'n, 581 F.3d 1, 21 (D.C. Cir. 2009) (holding that the FEC exceeded its authority by setting a floor on the percentage of revenue a PAC could attribute to non-federal activities); 11 C.F.R. § 113.2 (regulations on the use of candidate funds).

Although the FEC is not bound by the Federal Rules of Evidence, the Administrative Procedure Act allows for an administrative adjudicator to exclude "...irrelevant, immaterial, or unduly repetitious evidence." 5 U.S.C. § 556(d); Federal Election Commission MIJR 5878, Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioners Caroline C. Hunter and Matthew S. Peterson at 6 ("The standard for finding reason to believe ~ which is necessary for the Commission to conduct any type of investigation or take any discovery — is higher than the Federal Rules of Civil Procedure standard regarding sufficiency of a complaint — which allows discovery of virtually every complaint that identifies any potential legal or equitable claim. . .").

# Example 1: Julie Burkhart's Involvement at SWWC

Operation Rescue claims that, because the President of Trust Women PAC, Julie Burkhart, filed incorporation paperwork for the SWWC and posted a photo of herself at the SWWC, the PAC must be operating a for-profit business.<sup>34</sup> This claim is completely without merit

Operation Rescue seeks to claim that, because a person is associated with a for-profit business and a PAC, that the two must be related. This argument is not reflected in federal campaign finance law. Ms. Burkhart is free to associate with whomever she chooses, and the PAC is free to expend its funds and resources for legal purposes.

Operation Rescue's claim regarding Julie Burkhart's involvement in both the SWWC and Trust Women PAC does not implicate any issues in federal campaign finance law. The FEC should not take further action on the complaints in this section.

# Example 2: Purchases by the PAC

Operation Rescue claims that, because Trust Women PAC purchased materials that were meant for the SWWC, that the PAC is operating a for-profit business.<sup>35</sup> However, this claim is without merit, as the FEC does not limit how a PAC may expend its funds. Trust Women PAC would be completely within its rights under federal campaign finance law to make these purchases.

Operation Rescue points to three different disbursements made by the PAC: \$837.92 for a washer and dryer, \$342.80 for robes, and \$208 for website hosting.<sup>36</sup> All three of these disbursements have been reimbursed by the SWWC, and will appear on Trust Women PAC's October FEC report.

# Example 3: Phone Call by "Friend"

Operation Rescue claims that, because "a friend" of the claimant called the SWWC and subsequently received an email from a person with a Trust Women PAC email address, the PAC must be operating the SWWC.<sup>37</sup> This accusation is without merit. The FEC does not limit how a PAC may spend its funds, or use its resources.

<sup>37</sup> Id.

<sup>&</sup>lt;sup>23</sup> <u>See</u> 11 C.F.R. § 111.4(c); 11 C.F.R. § 111.4(d)(2) ( "The complaint should differentiate between statements based upon personal knowledge and statements based upon information and belief. . .[s]tatements which are not based upon personal knowledge should be accompanied by an identification of the source of information which gives rise to the complainants belief in the truth of such statements. . .").

<sup>&</sup>lt;sup>34</sup> Operation Rescue FEC Complaint at 5-6.

<sup>&</sup>lt;sup>35</sup> Operation Rescue FEC Complaint at 5.

<sup>&</sup>lt;sup>36</sup> Operation Rescue FEC Complaint at 6.

Katie Knutter, the employee mentioned in Operation Rescue's complaint, served as an intern for Trust Women PAC before moving to work at the SWWC. The fact that a former PAC intern is now employed by the SWWC is in no way a compelling argument for any wrongdoing on the PAC's part.

Operation Rescue's bases this entire section on the use of a PAC email address for SWWC business – a conspiracy theory that would require the FEC to somehow infer, based on clear speculation, that the two are intertwined.

The phone call from "a friend" of the claimant and the subsequent email are irrelevant, and do not implicate any issues in federal campaign finance law. The FEC should not take further action on the complaints in this section.

## Other Complaints in Section 7

Operation Rescue's complaint continues by making multiple claims without further substantiation. Operation Rescue claims that "... the PAC director and employees are simply pocketing the invisible flow of cash from this business" and that "... South Wind Women's Center nothing more than a money laundering scheme for PAC employees to embezzle funds, without suspicion of malfeasance." 38

Trust Women PAC categorically denies that any funds have been transferred for personal use, or otherwise embezzled in any way contrary to the law.

These examples do not meet the criteria for statements made with personal knowledge under 11 C.F.R. § 111.4(c). Since these accusations are not substantiated further, and do not implicate any issues in federal campaign finance law, the FEC should not take further action on the complaints in this section.

None of the examples that Operation Rescue cites have merit, as the FEC does not limit how a PAC may spend its funds. The SWWC has reimbursed Trust Women PAC for all expenses cited by Operation Rescue. Trust Women PAC has not used PAC funds and resources to operate a for-profit business, and would not be barred from doing so by FEC regulations.

5. Trust Women PAC has not violated federal campaign finance law by making disbursements to committees with the same address.

Operation Rescue claims that Trust Women PAC disbursed "funds to non-existent entities sharing the Trust Women PAC address." However, this claim is untrue, as federal campaign finance law does not limit Trust Women PAC in the way that Operation Rescue claims.

Operation Rescue cites multiple instances of disbursements by Trust Women PAC: to the American Action League, to the Trust Women Foundation, and to the Trust Woman PAC's non-federal account.<sup>39</sup>

<sup>38</sup> Operation Rescue FEC Complaint at 7.

<sup>&</sup>lt;sup>39</sup> Operation Rescue FEC Complaint at 8,

Each entity cited by Operation Rescue is an existing entity in good standing in its jurisdiction. The American Action League is an existing 501(c)(4) non-profit incorporated in Missouri. 40 Trust Women Foundation is an existing 501(c)(3) corporation incorporated in the District of Columbia. 41 Federal campaign finance regulations and Internal Revenue Service regulations do not require Trust Women PAC's non-federal account to be registered with the FEC or the Internal Revenue Service.

Trust Women PAC was fully within their rights to make all of these disbursements, as the FEC does not limit the use of PAC funds in the way that Operation Rescue claims.

Operation Rescue's citations of these disbursements actually weaken their position, as the proper disclosure of these disbursements shows Trust Women PAC's compliance with federal campaign finance law.

Trust Women PAC has not violated federal campaign finance law by making disbursements to committees with the same address. These accusations do not implicate any issues in federal campaign finance law. The FEC should not take further action on the complaints in this section.

### Conclusion

None of Operation Rescue's five complaints have merit: (1) Trust Women PAC has reported contributions to federal candidates and committees in a proper manner, and has adequately complied with federal campaign finance law, (2) the FEC has no jurisdiction over Kansas state law; (3) Trust Women PAC has not submitted reports through an unauthorized treasurer; (4) Trust Women PAC has not used PAC funds and resources to operate a for-profit business, and would not be barred from doing so under FEC regulations; and (5) Trust Women PAC has not violated federal campaign finance law by making disbursements to committees with the same address.

To the contrary, Operation Rescue's complaint contains multiple frivolous claims, and misstates federal campaign finance law multiple times.

Operation Rescue's complaints are ultimately motivated by politics, and not by a desire to ensure compliance with federal campaign finance law. Trust Women PAC has made its best efforts to ensure compliance with the FEC, and will amend their filings to rectify any issues. Trust Women PAC has retained the services of an auditor to identify issues for amendment.

The complaint uses clear hyperbole, even going so far as to suggest that Trust Women PAC's operations give "rise to the possibility of criminal enterprise." This statement is made without substantiation, and without further comment. Operation Rescue's complaint simply does not reflect the professionalism that is expected in these matters, and fails to meet the sufficiency standard for FEC complaints.

 <sup>40</sup> See Trust Women PAC Exhibit C, "American Action League Missouri Filing."
 41 See Trust Women PAC Exhibit C, "Trust Women Foundation DC Filing."
 42 Operation Rescue FEC Complaint at 9.

Trust Women PAC has been prompt and forthright in its responses to the FEC, despite any issues in reporting.

With this information in mind, I request that the FEC close the file on this complaint, and take no further enforcement action against Trust Women PAC.

I hereby declare, under penalty of perjury, that the above is trust and correct.

Sincerely,

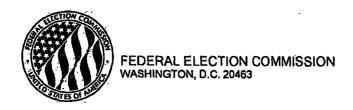
Neil P. Reiff

Counsel for Trust Women PAC and Amber Lockner in her official capcity as Treasurer

# Trust Women PAC Response to Operation Rescue FEC Complaint

# **EXHIBIT A**

- RFAI for Year-End 2012 Report (2 pages).
  Post General Report Notice (1 page).
  RFAI for October 2012 Report (3 pages).



RQ-2

July 31, 2013

TIFFANY REYNOLDS-RICHARDSON, TREASURER TRUST WOMEN PAC P.O. BOX 15433 WASHINGTON, DC 20003

Response Due Date 09/04/2013

**IDENTIFICATION NUMBER: C00466011** 

REFERENCE: YEAR-END REPORT (10/01/2012 - 12/31/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 1 item(s):

- 1. Your report was not signed by the treasurer or designated agent listed on your Statement of Organization (FEC Form 1). Please amend your report by providing the signature of an individual that is authorized to sign the report. (2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d)) If a new treasurer has been appointed, please file an amended Statement of Organization to reflect this change.
- Your report disclosed certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, Contributions to federal candidates and committees and contributions to nonfederal candidates and committees should be properly disclosed on separate Schedules B, supporting Lines 23 and 29, respectively, of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee

### TRUST WOMEN PAC

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will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,

Sarah gurid

Sarah Juris Campaign Finance Analyst Reports Analysis Division



December 14, 2012

RQ-7

REYNOLDS-RICHARDSON, TIFFANY, TREASURER TRUST WOMEN PAC PO BOX 15433 WASHINGTON, DC 20003

**IDENTIFICATION NUMBER: C00466011** 

REFERENCE: POST-GENERAL REPORT 10/1/2012 - 11/26/2012

#### DEAR TREASURER:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended.

It is important that you file this report immediately wish the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463. Please note that electronic filers must submit their reports electronically, as per 11 CER §104.18. A copy of the report or relevant portions must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.

If you liave any questions regarding this matter, please contact Christopher Ritchie in the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)694-1130.

Sincerely,

Deblie Chaven a

Debbie Chacona Assistant Staff Director Reports Analysis Division (RAD)



RQ-2

February 6, 2013

TIFFANY REYNOLDS-RICHARDSON, TREASURER TRUST WOMEN PAC P.O. BOX 15433 WASHINGTON, DC 20003

Response Due Date

**IDENTIFICATION NUMBER: C00466011** 

03/13/2013

REFERENCE: OCTOBER QUARTERLY REPORT (07/01/2012 - 09/30/2012)

## Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 5 item(s):

- 1. Line 6(a) of the Summary Page represents the total cash-on-hand as of January 1, 2012. This figure should be the same on all the reports covering the calendar year. Please amend your report to clarify the change made in Line 6(a). (2 U.S.C. § 434(b)(1) and 11 CFR §104.3(a)(1))
- 2. The beginning cash balance of this report does not equal the ending balance of your July Quarterly Report (4/1/12-6/30/12). Please correct this discrepancy and amend all subsequent reports that may be affected by the correction. (2 U.S.C. § 434)(b)(1))
- 3. Your calculations for Line 8 appear to be incorrect. Cash on hand at the close of the current reporting period should always equal the closing calendar year to date cash on hand amount. Please provide the corrected total on the Summary Page. (2 U.S.C. § 434(b))
- 4. The totals listed on Lines 11(a)(i) and 11(a)(ii), Column B of the Detailed Summary Page appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))

# TRUST WOMEN PAC

Page 2 of 3

- 5. Schedule B of your report discloses disbursements with the purpose "Internship Stipend" that appear to be made from petty cash. Please be advised that disbursements from a petty cash fund to any person or vendor for any single purchase or transaction may not exceed \$100. If payments to the original vendor exceed \$200 in a calendar year, a memo entry including the name of the original vendor as well as address, date, amount, and purpose of the original purchase must be provided. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (2 U.S.C. § 432(h)(2) and 11 CFR § 102.11)
- Your report disclosed a category of financial activity that has been reflected on the wrong line of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions to non-federal candidates and committees should be properly disclosed on a separate Schedule B, supporting Line 29 of the Detailed Summary Page. Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

TRUST WOMEN PAC

Page 3 of 3

Sincerely,

Sarah guris

Sarah Juris Campaign Finance Analyst Reports Analysis Division

324

# Trust Women PAC Response to Operation Rescue FEC Complaint

# **EXHIBIT B**

- October Letter to Change Treasurer (6 pages).
- November FEC Rejection Letter (1 page).
- November Email to Change Treasurer (6 pages).
- February FEC Rejection Letter (1 page).
- August 2013 Amended Form 1 (5 pages).



RECEIVED

and change the world

2012 NOV -5 AM 9: 26 FEC MAIL CENTER

October 29, 2012

Federal Elections Commission 999 E Street, N.W., Washington, DC 20453

To whom it may concern:

I am writing to notify of a change in organization treasurer for Trust Women PAC. Tiffany Reynolds-Richardson is vacating the position, effective immediately. The position will heretofore be filled by Amber Lockner. Enclosed please find an amended Statement of Organization for Trust Women PAC Please note that all other officers, as per your records, remain the same.

1

Julie Byrkhart

Founder and Director, Trust Women PAC

Enclosure: Amended Statement of Organization

FEC FORM 1		STATEM			2012 NO	ECEIVED V-5 AM 9:	26
1. NAME OF COMMITTEE (II	n full)	(Check If name is changed)		nple:if typing, type the lines.	12FE4M5	ALCENTI	ER
Trust W	omen !	PAC		<u> </u>			لبيا
		<u> </u>	الماليانيا				لبت
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(Check if a is changed)		Washington		<u> </u>	PFJ L	00031-	لنب
			CITY		STATE	ZIP CODE	
	address	SS (Please provide only of the provide only of		•		; <del> - - - - - -</del>  - - - - - -	لبب
COMMITTEE'S WEE	B PAGE ADI	DRESS (URL)					
(Check It is change		trust-1401	<u> </u>	````	<del></del>		لبت
2. DATE	0 2	5 70 12					
3. FEC IDENTIFIC	CATION NU	JMBER C	0.0.4	6.6.0.1.1.			
4. IS THIS STATE	MENT [	NEW (N) O	R E	AMENDED (A)		, <u></u>	
I certify that I have ::  Type or Print Name		nis Statement and to the	best of my l		is true, correct a	nd complete.	
Signature of Treasur	1				Date 1.0	12.51 E	0 2
NOTE: Submission of		acus, or incomplete inform ANY CHANGE IN INFOR				e penaltes of 2 U.	.S.C. §437g.
Office Use				For further Information C Federal Election Commissi Toll Free 800-424-9530		FEC FORM	

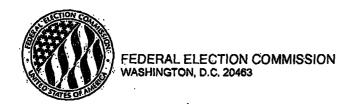
5.

FEC Form 1 (Revised 02/2009) Page 2
TYPE OF COMMITTEE
Candidate Committee:  (a) This committee is a principal campaign committee. (Complete the candidate information below.)
(b) This committee is a principal campaign committee, [Complete the candidate]  (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate)
Information below.) Name of
Candidate
Candidate Office State Party Affiliation Sought: House Senate President Oistrict
(c) This committee supports/opposes only one candidate, and is NOT an authorized committee.
Name of Candidate
Party Committee:
(d) This committee is a (National, State or subordinate) committee of the (Democratic, Republican, etc.) Party.
Political Action Committee (PAC):
(e) This committee is a separate segregated fund. (identify connected organization on line 6.) its connected organization is a
Corporation Corporation w/o Capital Stock . Labor Organization
Membership Organization : Trade Association Cooperative
In addition, this committee is a Lobbylet/Registrant PAC.
This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
In addition, this committee is a Lobbyist/Registrant PAC.
In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)
Joint Fundraising Representative:
(g) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a foderal candidate.
(h) This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.
Committees Participating in Joint Fundraiser
propietal propie
Committee Commit
2. FEC ID number Ci
3. [ FEC ID number C.] [ F
4. FEC ID number C

FEC Form 1 (Revised (	2/2009)	Page 3
Write or Type Committee Name		
Trust Women	PAC	
Name of Any Connected C	rganization, Affiliated Committee, Joint Fundralsing Representa	itive, or Leadership PAC Sponsor
MOINELLLI		
1111111111		1   1   1   1   1   1   1
Mailing Address	111111111111	
	11111111111111111	
	11111111111111111111	1 1
	CITY . STAT	TE ZIP CODE
Relationship: Connected	Organization Affiliated Committee Joint Fundraising Repre-	sentative Leadership PAC Sponsor
Custodian of Records: Ider books and records.	ify by name, address (phone number optional) and position of t	the person in possession of committee
Full Name Amb	Lockner	
Malling Address ·	1P.O. B.O.K. 312122	ليستستست
	<u> </u>	<u>.</u>
	Wilchita Ki	5 6,7,3011-
Title of Position	CITY	E ZIP CODE
Tirielasiviaciri	Tetephone number	[31 6]-[4,25]-[3,21,5]
Treasurer: List the name and any designated agent (e.g., a	address (phone number — optional) of the treasurer of the commissistant freasurer).	nittee; and the name and address of
Full Name of Treasurer	10 Lockner 1	لتبيينينا
Malling Address	P101 B101X1 131212121 1 1 1 1 1 1 1 1 1 1 1 1 1 1	لىسىسىسى
	<del></del>	
	CITY STATE	
Title or Position	CITY STATE	2 217 CODE

FEC Form 1 (Revised 02	<i>[2</i> 009)	<del></del>	Page 4
Full Name of Designated Agent Amber	Lockner Po Box 3222		
<u>i</u> <u>i</u> V	CITY	STATE	67.701] ZIP CODE
Treasurer	1 Telep	hone number 316	7-425-3215
. Banks or Other Depositories: I safety deposit boxes or maintain Name of Bank, Depository, etc.	List all banks or other depositories in which the funds.	e committee deposits fun	ds, holds accounts, rents
<del></del>	of America Pennsylvania		المستنبين
<u> </u>	Vashington	، سبب سبب	20003-
	CITY	STATE	ZIP CODE
Name of Bank, Depository, etc.			
نبنيا.	<del> </del>	<u> </u>	ليتنتيب
Malling Address			لحسسست
L		1111111	للسيسين
L		ا ليا لي	لىسىا-لىسىا
	СІТУ	STATE	ZIP CODE

Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING The FEC added this page to the end of this filing to indicate	G DOCUMENTS e how it was received.
Hand Delivered	Date of Receipt
USPS First Class Mail	Postmarked 10/30/12
USPS Registered/Certified	Postmarked (R/C)
USPS Priority Mail	Postmarked
Delivery Confirmation™ or Signature Confi	irmation™ Label
USPS Express Mail	Postmarked
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No Postmark	
Overnight Delivery Service (Specify):	Shipping Date
Next Busine	ss Day Delivery
Received from House Records & Registration Office	Date of Receipt
Received from Senate Public Records Office	Date of Receipt
Received from Electronic Filing Office	Date of Receipt
Other (Specify):	Receipt or Postmarked
Imp	11/5/12
PREPARER (3/2005)	DATE PREPARED



MS-N

November 13, 2012

AMBER LOCKNER, TREASURER TRUST WOMEN PAC PO BOX 3222 WICHITA, KS 67201

**IDENTIFICATION NUMBER: C00466011** 

REFERENCE: FILING RECEIVED 11/5/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the filing referenced above.

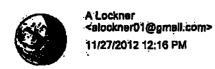
Please be advised that once a committee meets the requirements of electronic filing, all subsequent statements, designations, reports, and amendments must be filed electronically. (11 CFR §§ 104.18(a)(2), 104.18(c) and 104.18(f)). Your paper filing received 11/5/2012 will not be considered an Amended Statement of Organization (FEC FORM 1). To amend this filing, you must submit your FEC FORM 1 in an electronic format.

If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division), or my local number, (202) 694-1137.

Sincerely,

David Garr

Campaign Finance Analyst Reports Analysis Division



To pubrec@fec.gov,

G.

pcc

Subject: Amended Statement of Organization (FEC FORM 1) for Trust Women PAC

1 attachment



www.fec.gov\_pdf\_forms\_fecfrm1sf.pdf

Attached please find the electronic copy of the Amended FEC FORM 1 for Trust Women PAC (C00466011).

Regards,

Amber Lockner

FEC FORM 1	STATEME			:. Office Use Only
1. NAME OF COMMITTEE (in full)	(Check if name is changed)	Example: If typing, type over the lines.		·
Trust Women I	PAC	<del>╟╬╌┺╶╠╌╂</del> ╌╂╌╂╌╂╌	<u> </u>	
ADDRESS (number and street)	PO Box 154	33 14	<u> </u>	
(Check if address is changed)	Washington		DC <sub>1</sub> 2	20003
		ОЛУ	STATE	ZIP CODE
COMMITTEE'S E-MAIL ADDRE		e-mail address) OMENDAC.OFC		
COMMITTEE'S WEB PAGE AD  (Check il address la changed)	trustwomen	pac,org		
2. DATE 10 2	5 2012			•
3. FEC IDENTIFICATION N	UMBER CO	0466011		
4. IS THIS STATEMENT	NEW (N) OR	AMENDED (	V	
I certify that I have examined t			lef it is true, correct a	and complete.
Type or Print Name of Treasure Signature of Treasurer	, Amber Loc	VIIC!	Date 10	25 2012
NOTE: Submission of false, error	eque, or treamplate information ANY CHANGE IN INFORMAT			he penalties of 2 U.S.C. §437g.
Office Use Onv		For further informati Federal Election Com Toll Free 800-424-953	mitsion	FEC FORM 1 (Revised 02/2009)

FEC F	orm 1 (Revised 02/2009) Page 2
	COMMITTEE
(a)	e Committee:  This committee is a principal campaign committee. (Complete the candidate information below.)
(b)	This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate
Name of Candidate	
Candidate Party Affilia	don State Sought: House Senate President
(c)	This committee supports/opposes only one candidate, and is NOT an authorized committee.
Name of Candidate	
Party Co	mmittee: [National, State [Democratic,
(4)	This committee is a (National, State or subordinate) committee of the (Committee of the Republican, etc.) Party.
Political A	Action Committee (PAC):
(0)	This committee is a separate segregated fund. (Identify connected organization on line 6.) its connected organization is a:
	Corporation w/o Capital Slock Labor Organization
	Membership Organization Trade Association Cooperative
	In addition, this committee is a Lobbyist/Registrant PAC.
o 🖂	This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
	In addition, this committee is a Lobbyist/Registrent PAC.
	In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)
Joint Fun	draising Representative:
(g) [	This committee collects contributions, pays fundraising expanses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a foderal candidate.
(r)	This committee collects contributions, pays fundralising expenses and disburses not proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.
Got	mmittees Participating in Joint Fundralser
1,	
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z. 3.	FEC ID number C
4.	

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FEC Form 1. (Revised	02/2009)	Paga 3
Write or Type Committee Nam		
Trust Women	PAC	
6. Name of Any Connected	Organization, Affiliated Committee, Joint Fundraising Represen	fative, or Leadership PAC Sponsor
NONE	1111111111	
	11111111111111111111111	
Malling Address	1111111111111111111111	
	CITY \$7	ATE ZIP CODE
Relationship: Connecto	ed Organization Affiliated Committee Joint Fundralsing Repr	resentative Leadership PAC Sponsor
7. Gustodian of Records: Ide books and records.	ntily by name, address (phone number optional) and position of	the person in possession of committee
Full Name Ambe	rLockner	كحد فريع والاراران
Mailing Address	PO Box 3222	
Walling Francisco		
	Wichita K	S 67201
Title or Position	CITY STA	TE ZIP CODE
Treasurer	Telephone number	316, -425, -3215,
8. Treasurer: List the name a any designated agent (e.g.,	nd address (phone number — optional) of the treasurer of the comessistant freesurer).	mittee; and the name and address of
Full Name of Treasurer	er Lockner	لتتنبينين
Mailing Address	PO Box 3222	
	<del></del>	
	Wichita K	(S) 67201 - L zip code
Title or Position Treasurer	Telaphone number	316, - 425, - 3215

			. 7
FEC Form 1 (Revisi	od 0 2 /2009)		Page 4
Full Name of Designated Ambe	er Lockner		لسبسبسا
Mailing Address	PO Box 3222		<del>Lunitanul</del>
		بتنتيب	لببتنيين
	Wichita city	STATE	167201  -
Title or Position Treasurer	Telepho	ne number 31	6  - 1425  - 13215,
Banks or Other Deposito safety deposit boxes or ma Name of Bank, Depository,		committee deposits	funds, holds accounts, rents
Bank	of America	<u> </u>	ليبيين
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	Washington	رع ب	20003
	сπу ;	STATE	ZIP CODE
Name of Bank, Depository	, etc.		
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Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS The FEC added this page to the end of this filing to indicate how it was received.							
Hand Delivered	Date of Receipt						
USPS First Class Mail	Postmarked						
USPS Registered/Certified	Postmarked (R/C)						
USPS Priority Mail	Postmarked						
Delivery Confirmation™ or S	ignature Confirmation™ Label						
USPS Express Mail	Postmarked						
Postmark Illegible							
No Postmark							
Overnight Delivery Service (Specify):	Shipping Date						
المما	Next Business Day Delivery						
Received from House Records & Registrat	Date of Receipt ion Office						
Received from Senate Public Records Office	Date of Receipt ce						
Received from Electronic Filing Office	Date of Receipt						
Other (Specify): $\Sigma$ - Mai'	Date of Receipt or Postmarked						
h	11/27/12						
PRÉPARER (3/2005)	DATE PREPARED						
(JIEUUU)							



MS-N

February 6, 2013

TIFFANY REYNOLDS-RICHARDSON, TREASURER TRUST WOMEN PAC P.O. BOX 15433 WASHINGTON, DC 20003

IDENTIFICATION NUMBER: C00466011

REFERENCE: Filing Received 11/27/12

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the filing referenced above.

Your filing received on 11/27/12 will not be considered an Amended Statement of Organization (FEC FORM 1). Please be advised that when an electronic filer amends a Statement of Organization, it must amend the actual FORM 1 electronically to reflect any changes or corrections. 11 CFR §102.2(a)(2) Please electronically amend your actual FORM 1 to provide the new information included on the Miscellaneous Text Submission (F99) filing(s) referenced above.

If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division). My local number is (202) 694-1175.

Sincerely,

Sarah guris

Sarah Juris Campaign Finance Analyst Reports Analysis Division 14044M5500%

lmage# 13964493121

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FEC FORM 1		ORGAN		-		ifice Use Only
1: NAME OF COMMITTEE (in	f.all\	(Check if named)		ple: If typing, type	12FE4M5	
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Trust Wom	en PAL	<i>j</i> <del> - - - - - -</del>			<del></del>	
سسسا	4444	<del></del>	-		<u> </u>	
ADDRESS (number a	nd street)	PÓ Box 3222	<u> </u>	<u>:                                    </u>	<u> </u>	
X (Check if is change)	address	Latere				
ian is change		Wichita CITY A			KS 67	ZIP CODE
COMMITTEE'S E-MA	AIL ADDRES	s				
(Check if is change	address d)	info@trustwomen	pac.org	<u> </u>	<u> </u>	لبسسسي
		Optional Second E-M	lail Address			
			<del></del>	<del> </del>	<del></del>	
COMMITTEE'S WEE	address	RESS (URL) http://www.trustwomer	npac.org			
2. DATE	9 03	2012				
3. FEC IDENTIFIC	CATION NU	MBER ►	C C00465011	engen, ger ing na granig g g g Alama N. W. Alama Lennis		
4. IS THIS STATE	MENT	NEW (N)	OR 🗓	AMENDED (A)		
I certify that I have	examined this	s Statement and to th	e best of my k	nowledge and belief i	t is true, correct an	d complete.
Type or Print Name	of Treasurer	Amber Lockner				<u> </u>
Signature of Treasur	er Amber	Lockner		Electronically Filed]	Date ( 08 )	02 2013
NOTE: Submission of	false, emoneo	ous, or incomplete infor	mation may subj PRMATION SHO	ed the person signing	this Statement to the	penalties of 2 U.S.C. §437g.
Office Use Only				For further Information Federal Election Commiss Toll Free 800-424-9630 Local 202-694-1100		FEC FORM 1 (Revised 06/2012)

FE	C For	rm 1 (Revised 02/2009) Page 2	
_		COMMITTEE	
Candi		e Committee:	
(a)		This committee is a principal campaign committee. (Complete the candidate information below.)	
(b)		This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidation below.)	ate
Name ( Candid		<u> </u>	l l
Candid Party A		Office State  Ion Sought: House Senate President  District	
(c)	Taring Taring	This committee supports/opposes only one candidate, and is NOT an authorized committee.	
Name Candid			للا
Party	Con	mmittee:	
(d)		This committee is a (National, State (Democratic, Republican, etc.)	Party.
Politi	cal A	Action Committee (PAC):	
(e)		This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization	ion is a:
		Corporation Corporation w/o Capital Stock	ation
		Memborship Organization Trade Association Cooperative	
		In addition, this committee is a Lobbyist/Registrant PAC.	
(1)	×	This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund o committee. (i.e., nonconnected committee)	r party
		In addition, this committee is a Lobbyist/Registrant PAC.	
		in addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)	
Joint	Func	draising Representative:	
(g)		This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more politic committees/organizations, at least one of which is an authorized committee of a federal candidate.	al
(h)		This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more politic committees/organizations, none of which is an authorized committee of a federal candidate.	el
	Com	nmittees Participating in Joint Fundraiser	
	1.	FEC ID number C	
	2.	FEC ID number C:	
	3.	FEC ID number C	in our lawy
	4.	FEC ID number	

			$\neg$
FEC Form 1 (Revised			Page 3
Write or Type Committee Nan			
Trust Women I	<del></del>		
6. Name of Any Connected	Organization, Affiliated Committee, Jo	pint Fundraising Representative	e, or Leadership PAC Sponsor
None		1111111111	
Mailing Address			
·			
		· 1.	1,,,,,
	CITY	STATE	ZIP CODE
Relationship:	ed Organization	Joint Fundraising Represen	Leadership PAC Sponsor
<ol> <li>Custodian of Records: Id books and records.</li> </ol>	entify by name, address (phone number	optional) and position of the	person in possession of committee
Amber L Full Name	ockner		
Mailing Address	PO Box 3222		
	1.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
	Wichita	KS	67201
Title or Position	CITY	STATE	ZIP CODE
Treasurer	um maria	Telephone number	316 - 425 - 3215
8. Treasurer: List the name a any designated agent (e.g.,	and address (phone number optional) , assistant treasurer).	of the treasurer of the committee	e; and the name and address of
Full Name Amber L of Treasurer	ockner		<u> </u>
Mailing Address	PO Box 3222		لتبيينين
		<u> </u>	ليتنيين
	Wichita CITY	STATE	ZIP CODE
Title or Position Treasurer		Tolephone number	316 - 425 - 3215

FEC Form 1	(Revised 02/2009)		Page 4
		•	
Full Name of Designated An Agent	nber Lockner		
Mailing Address	PO Box 3222	·	
	Wichita	KS STATE	67201 - L. J.
Title or Position Treasurer	<u>1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -</u>	number 31	6 - 425 - 3215
Banks or Other Dep safety deposit boxes	positories: List all banks or other depositories in which the com or maintains funds.	mittee deposits f	unds, holds accounts, rents
Name of Bank, Depo	ository, etc.		
В	ank of America		<u> </u>
Malling Address	201 Pennsylvania Ave SE		لبسسسبسب
	Washington	] DC	20003
	CITY	STATE	ZIP CODE
Name of Bank, Depo	ository, etc.		
ĵΨ	enture Bank	<u> </u>	
Malling Address	5601 Green Valley Dr		
	Ste 120  Bloomington	MN L	55437
	CITY	STATE	ZIP CODE

Form/Schedule: F1N Transaction ID :

July 15 Quarterly Report

Form/Schedule: Transaction ID:

# Trust Women PAC Response to Operation Rescue FEC Complaint

# **EXHIBIT C**

- American Action League Missouri Filing (1 page)
  Trust Women Foundation DC Filing (2 pages)

# Missouri Secretary of State, Jason Kander

SOS Home :: Business Services :: Business Entity Search

Search **OBy Business Name ®**By Charter Number By Registered Agent ©For New Corporations Verify OVerify Certification Registration Report File Online File Fictitious Name Registration File Online **©Renew Online** File LLC Registration File Online Online Orders @Register for Online

Order Good Standing
 Order Certified Documents

Orders

Date: 9/25/2013 (Click above to view filed documents that are available.)

File Report Online, click here.

For a blank Registration Report, click here.

**Business Name History** 

Name Trust Women Action League

The American Action League

Name Type Legai Prev Legai

Non-Profit Corporation - Domestic - Information

Charter Number: Status:

Mainder,

N01,094949 Good Standing

Entity Creation Date:

10/25/2010 MO

State of Business.: Expiration Date:

Perpetual

Expiration Date:

Perpetual 12/10/2012 8:00:00 AM

Last Registration Report Filed Date: Last Registration Report Filed:

2012

Registered Agent

Agent Name:

Reynolds, Tiffany

Office Address:

4660 Maryland Avenue , Suite 200

St. Louis MO 63108

Mailing Address:

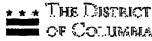
Commissions Phone: <u>(573) 751-2783</u> Toll Free: <u>(886) 223-6535</u> Corporations
Phone: (573) 751-4153
Toll Free: (866) 223-6535

UCC Office Phone: (573) 751-4628 Toll Free: (866) 223-6535

600 West Main Street Jefferson City, MO 65101

Main Office: (573) 751-4936





<sup>r</sup>ins tilk, dvo flance



Search	Search;		Ask the Mayor   Subsc	ribe to Emails   Agency Dir	ectory   311 Online   Closures
311 Online	District Residents	Businesses	Visitors	Media	Online Services

Home Edit Account | Loa Out

# TRUST WOMEN FOUNDATION INC. - Initial File Number: 298238

Database Reference	ze# 2699985	
Business.Name	TRUST WOMEN FOUNDATION	
Suffix	INC.	
Registration Date	6/24/2010	
Entity Status	Active	
Foreign Name	NA	
Date of Organization	en 6/24/2010	
State	District of Columbia	
Country	USA	
Line2	NO DATA	
Line2 City LEGACY		
City LEGACY!	NO DATA State District of Columbia Zip 00000	
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